

1382 West Ninth Street, Suite 200  
Cleveland, Ohio 44113

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[www.TRCsolutions.com](http://www.TRCsolutions.com)

April 11, 2016

RCRA Branch (LR-8J)  
U.S. EPA, Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604

Attention: Mr. Brian Kennedy

Reference: Quarterly Progress Report  
Consent Agreement and Final Order (CAFO)  
Docket No. RCRA-05-2014-0013  
Project No. 242933.0000

Dear Mr. Kennedy:

TRC Environmental Corporation (TRC), is pleased to submit, on behalf of Canton Drop Forge (CDF), the attached Progress Report for the **First Quarter 2016**, as agreed to in the Consent Agreement and Final Order (CAFO) journalized by the United States Environmental Protection Agency (U.S. EPA) on September 18, 2014.

Should you have any questions regarding the enclosed document, please contact me at (216) 344-3072 or via e-mail [kteuscher@trcsolutions.com](mailto:kteuscher@trcsolutions.com).

Sincerely,

**TRC Environmental Corporation**

Kathleen R. Teuscher  
Risk Assessor/Project Manager

cc: Erik Hagen – DERR CO, Ohio EPA  
Don Vogel – DERR CO, Ohio EPA  
Ron Shadrach – DHWM, NEDO  
Eaton Weiler – U.S. EPA, Region 5  
Brad Ahbe – CDF

**PROGRESS REPORT – First Quarter 2016**  
**Canton Drop Forge, Inc.**  
**Canton, Ohio**  
**U.S. EPA ID No. OHD00446S142**

**A. IDENTIFICATION OF FACILITY AND ACTIVITY**

TRC Environmental Corporation (TRC), at the request of Canton Drop Forge Inc. (CDF), has prepared this quarterly Progress Report (First Quarter 2016) as required by the Consent Agreement and Final Order (CAFO; effective date September 18, 2014) between U.S. EPA Region 5 and CDF for CDF's facility at 4575 Southway Street SW, Canton, Ohio. As required by Paragraph 47 of the CAFO, this Progress Report discusses the work performed during the previous quarter, the data collected, and any problems encountered. This Report also includes a progress update on tasks specified on the project schedule.

**B. STATUS OF WORK AT THE FACILITY AND PROGRESS DURING THE QUARTER**

The CDF Ponds Closure Plan (Closure Plan), dated September 8, 2014, was approved by Ohio EPA on October 29, 2014. Pond No. 1 remediation was initiated during the fourth quarter of 2014 and completed during the first quarter of 2015. Remediation activities at Pond No. 1 included the removal of oil-water emulsion and impacted sediment and surrounding soils, and restoration of the pond including placement of an impermeable clay liner. These remediation and restoration activities were previously described and documented in previous Progress Reports submitted as required by the CAFO. Implementation of the Closure Plan and tasks as they are related to the remediation of Pond No. 2 during first quarter 2016 are listed below.

**(i) The status of the removal of oil-water emulsion from Pond No. 2.**

Dewatering of Pond No. 2 was completed during previous quarter (4<sup>th</sup> Quarter 2015).

**(ii) The status of the excavation of oil-impacted bottom material from Pond No. 2.**

Excavation of oil-impacted bottom material from Pond No. 2 was initiated during the fourth quarter of 2015, and was completed in the first quarter of 2016. At the close of fourth quarter 2015, removal of bottom material had progressed around the perimeter of the pond unit shifting the excavated material towards the center of the pond for staging and removal.

Ron Shadrach of Ohio EPA visited the site on January 19, 2016. Mr. Shadrach identified a darkened seam along the south wall and requested additional material be removed to see whether this seam disappears or diminishes. Attachment 1 includes a photo log provided by Ohio EPA showing this seam. At the request of Ohio EPA, EMS (CDF's contractor) performed some test cuts to demonstrate that this seam continues indeterminately. Attachment 1 also includes pictures of the test cuts showing this seam. Additional material was removed to the extent practicable and confirmation samples were collected representing existing conditions at the conclusion of the excavation activities to support subsequent evaluation under the Ohio Voluntary Action Program (VAP) following closure. During the final excavation activities, excess soil was being used as a ramp to move equipment into and out of the pond unit. CDF sampled beneath this soil upon removal as part of the planned confirmation sampling to be performed to support subsequent evaluation under the VAP following closure.



Documentation (e.g., manifests) of waste disposal of the solid materials removed from the Pond No. 2 excavation (supplied by the disposal facility) will be included in the final certification report. Transport amounts of Calciment® (used as a drying agent for solidification of the bottom material prior to off-site disposal) and waste transport material is included with this quarterly report (Attachment 2).

**(iii) The status of the excavation of oil-affected soils adjacent to Pond No. 2.**

Excavation of oil-impacted material and soil adjacent to Pond No. 2 was being performed in conjunction with removal of bottom material to the extent reasonably possible (e.g., limitation for continued access during removal process). This material is being disposed with the bottom material described above, and the volumes were not tracked separately. As noted above, transport amounts of the Calciment® and waste material is included with this quarterly report (Attachment 2).

Mr. Shadrach of Ohio EPA visited the site on February 5, 2016 and confirmed that removal activities of Pond No. 2 were essentially complete. Photos from this visit are included in Attachment 1. A vitrified clay tile pipe intersected by the installation of the stormceptor was identified as seeping small amounts of water. This pipe has since been plugged and terminated. Additionally, a black corrugated HDPE pipe containing dry oily sludge was uncovered. This pipe and material was removed and the opening was plugged with concrete. A brick structure was also encountered below grade on the west end of Pond No. 2. This structure was essentially removed and excavation was taken as far as possible, limited by maintaining the integrity of the sidewall and slope of the pond unit. No additional pipes were discovered in this vicinity. Lastly, a former brick structure located on the east side of the pond just north of the existing pump house and just beyond the perimeter of the pond required investigation to verify that associated oily material was addressed. A small diameter metal pipe was identified, and exposed and excavated as far as possible based on the constraints of the pond sidewall, and then pinched shut. About five feet of pipe was removed. No additional pipes or similar structures were identified. However, to the extent possible CDF agreed to the removal of some wood and scrap identified near the pump house that may have been impacted by petroleum material, and further investigate, and if possible, remove the former brick structure noted above.

Mr. Shadrach and Mr. Bill Lutz of Ohio EPA visited the site again on February 9, 2016 and provided a verbal acknowledgement that removal activities were complete.

The survey of the pond unit following the removal activities (dated 1/29/2016) is provided in Attachment 3.

**(iv) The status of confirmatory sampling (as applicable).**

Confirmatory sampling was performed during the first quarter of 2016 following removal activities for the purpose of evaluating site conditions under the Ohio VAP following closure of the ponds. Confirmation samples included collection of random grid samples as well as judgmental samples biased towards areas of potential impact based on visual observations (e.g., staining, seams, pipe inlets or structures identified during removal activities). These results will be included in future VAP submittals for the property.

**(v) The status of backfilling and restoration of Pond No. 2.**

Backfilling and restoration of Pond No. 2 was initiated following adequate removal of all residuals within Pond No. 2 and following the confirmatory sampling activities noted in (iv) above. Backfill

material consisted of approximately 10,502 tons of ODOT Spec 603 gravel and concrete sand from Tiger Sand & Gravel. The survey of the pond unit following placement of fill material (dated 3/1/2016) is provided in Attachment 3.

The clay used to construct the pond liner was obtained from The Kimble Company (Kimble) located in Dover, Ohio. Virgin clay was mined from various properties in Tuscarawas County owned and operated by Kimble. The clay material was staged at their Dover facility prior to delivery. Approximately 3,930 tons of clay was utilized to construct the approximately 2-ft thick liner. The survey of the pond unit following clay placement (dated 3/23/2016) is provided in Attachment 3.

Topsoil used to complete the restoration is from King's Dump Truck & Topsoil located in Canton, Ohio. Letters certifying the source of the materials are provided in Attachment 4.

At the close of the first quarter 2016, placement of the clay liner and final topsoil is complete.

#### **C. PROBLEMS ENCOUNTERED DURING THE QUARTER**

As noted above, an abandoned brick structure was encountered below grade on the west end of Pond No. 2. As this structure became uncovered, additional pipes on either side of the structure were also identified. The unknown pipes appeared to be filled with impacted material and further investigation was necessary to determine how to properly address these structures. Photos are provided in Attachment 1.

#### **D. ACTIONS TAKEN TO RECTIFY PROBLEMS**

Review of a drawing from 1994 (provided in Attachment 5) shows three pipelines entering Pond No. 2; one of the lines appears to be a storm drain coming from Southway Street (that was previously capped with concrete at the street). After additional soil removal, the pipe located below the new stormceptor line and the line on the north side discontinued. Additional photos are provided in Attachment 1. It was concluded that these pipes were remaining pipe stubs from the abandoned structure just removed. These extra pipes on the West side were cleaned out to the extent possible and filled with concrete. There was no sign of the storm drain line from the street. The remaining storm drain line connects to the stormceptor which now drains into Pond No. 2 at a location just south of the old removed drain that originated at the street.

#### **E. PROJECT SCHEDULE**

Remediation of Pond No. 2 was initiated mid- to late October following completion of the sanitary sewer connection and after dewatering the pond. The project schedule and progress report are presented below by task:

<b>Item</b>	<b>Task</b>	<b>Description of Status</b>
1	Consent Agreement and Final Order U.S. EPA Docket No. RCRA-05-2014-0013	Effective date September 14, 2014.
2	Closure Plan Submittal	Received by Ohio EPA on September 9, 2014. Approved October 29, 2014.

Item	Task	Description of Status
3	Agency Review and 30-Day Public Notice Period	Submitted for public comment period ending October 17, 2014.  Closure Plan approved October 29, 2014.
4	Installation/Implementation of Upgraded Oil Water Separator (OWS) System	Construction complete and the system is operational.
5	Contractor Procurement/Mobilization (including 10-Day Notification to Ohio EPA prior to mobilization)	Kick-off meeting held at CDF on November 19, 2014. Attendees included CDF, Ohio EPA, and TRC Environmental. The meeting served as the 10-day notification to Ohio EPA.  Environmental Management Specialists, Inc. (EMS) was procured through CDF as the contractor to perform the excavation. TRC is performing oversight.
6	Pond No. 1 Remediation: <ul style="list-style-type: none"> <li>- Dewatering, Excavation, Disposal</li> <li>- Visual Inspection (CDF/Ohio EPA) and Verification of Completion</li> </ul>	Pond No. 1 remediation was initiated following the above 10-day notification. Dewatering, excavation, and disposal were near completion as of the close of the fourth quarter 2014, with removal of the bottom clay liner overlapping into the first quarter of 2015.  Visual inspection by Ohio EPA to verify completion was performed January 20, 2015.
7	Pond No. 1 Backfill, Installation of Clay Liner	Pond No. 1 was backfilled late January 2015 and installation of the clay liner immediately followed.
8	Pond No. 2 Remediation: <ul style="list-style-type: none"> <li>- Dewatering, Excavation, Disposal</li> <li>- Visual Inspection (CDF/Ohio EPA)</li> </ul>	Initial dewatering began in September 2015 with Pond No. 2 water being treated and recycled for reuse within the CDF facility. Construction for the sewer connection is complete. Dewatering was completed in the fourth quarter 2015. Subsequent remediation of Pond No. 2 was initiated in the fourth quarter 2015 and completed in the first quarter 2016.  Visual inspection of remediation progress was performed by Ohio EPA on January 19, 2016, February 5, 2016, and February 9, 2016 to verify completion of removal activities.
9	Pond No. 2 Backfill, Installation of Clay Liner	Pond No. 2 was backfilled March 2016 and installation of the clay liner immediately followed.
10	Closure Certification Document (60 days of completion of the closure activities)	To be completed following conclusion of previous tasks.
11	Quarterly Progress Reports	Initiated 3 <sup>rd</sup> quarter 2014.



**ATTACHMENT 1**

**PHOTO LOG**

## **1A. OHIO EPA SITE VISIT**



Canton Drop Forge – February 1 and 5, 2016  
Pond 2 Closure Removal



Photo 1: Contact of oily sediment at right with clay layer overlain by sand and gravel fill with intermixed ash/slag/soil fill near surface



Photo 2: Panorama of above photo. Oily material at right being removed. Removal complete in background.





Photo 3: View of SW corner. Brick structure believed to have been former pumphouse approx. 12 ft. bgs. All pipes to be plugged except new stormceptor pipe (white PVC). Lowest pipe is fallen tile.



Photo 4: Close up of photo 3.





Photo 5: View on 2/1/2016. Dark solidified oily material being removed on right.



Photo 6: View as above on 2/5/2016. Removal of solidified oily material on right nearly complete.

## **1B. TEST CUTS**



# ATTACHMENT 1


## PHOTO LOG (Test Cuts)



Photo 1: TestCut 001



Photo 2: TestCut 003

TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:	
242933	Canton Drop Forge	1 of 3	Canton Drop Forge	4575 Southway Street SW, Canton, Ohio	



# ATTACHMENT 1


## PHOTO LOG (Test Cuts)



Photo 3: TestCut 004



Photo 4: TestCut 005


TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:	
242933	Canton Drop Forge	2 of 3	Canton Drop Forge	4575 Southway Street SW, Canton, Ohio	

## ATTACHMENT 1

### PHOTO LOG (Test Cuts)



Photo 5: TestCut 006

TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:	
242933	Canton Drop Forge	3 of 3	Canton Drop Forge	4575 Southway Street SW, Canton, Ohio	

## **1C. IDENTIFIED PIPELINES**



# ATTACHMENT 1


## PHOTO LOG (Identified Pipelines)



Photo 1: Pipeline



Photo 2: Pipeline

TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:	
242933	Canton Drop Forge	1 of 3	Canton Drop Forge	4575 Southway Street SW, Canton, Ohio	



# ATTACHMENT 1


## PHOTO LOG (Identified Pipelines)



Photo 3: Pipeline



Photo 4: Pipeline

TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:	
242933	Canton Drop Forge	2 of 3	Canton Drop Forge	4575 Southway Street SW, Canton, Ohio	



# ATTACHMENT 1


## PHOTO LOG (Identified Pipelines)



Photo 5: Pipeline



Photo 6: Pipeline

TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:	
242933	Canton Drop Forge	3 of 3	Canton Drop Forge	4575 Southway Street SW, Canton, Ohio	



**ATTACHMENT 2**  
**DISPOSAL QUANTITIES**

Calciment PurchaseLandfill Tickets

Original Estimate was 14,850 tons. New Estimate is 18,400 tons

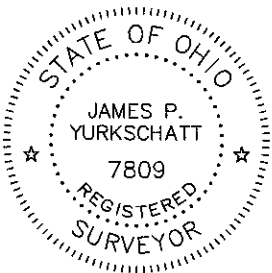
	Date	Tons	Accum Tons	Cost	Running Total	Date	Amount (tons)	Accum Tons	Cost	Running Total
1	11/16/15	24.98	24.98	\$3,123	\$3,123	11/02/15-11/5/15	977.03	977.03	\$22,472	\$22,472
2	11/17/15	25.05	50.03	\$3,131	\$6,254	12/1/15-12/3/15	2,605.09	3,582.12	\$59,917	\$82,389
3	11/18/15	25.24	75.27	\$3,155	\$9,409	12/4/15	434.80	4,016.92	\$10,000	\$92,389
4	11/18/15	22.89	98.16	\$2,861	\$12,271	12/7/15-12/15/15	2,438.82	6,455.74	\$56,093	\$148,482
5	11/19/15	24.99	123.15	\$3,124	\$15,394	12/16/15	478.10	6,933.84	\$10,996	\$159,479
6	11/20/15	25.13	148.28	\$3,141	\$18,536	12/17/15	757.54	7,691.38	\$17,423	\$176,902
7	11/23/15	25.33	173.61	\$3,166	\$21,702	12/18/15	630.53	8,321.91	\$14,502	\$191,404
8	11/23/15	23.29	196.90	\$2,911	\$24,613	12/21/15	509.60	8,831.51	\$11,721	\$203,125
9	11/23/15	22.70	219.60	\$2,838	\$27,451	12/23/15	336.20	9,167.71	\$7,733	\$210,858
10	11/23/15	24.28	243.88	\$3,035	\$30,486	12/30/15	880.96	10,048.67	\$20,262	\$231,120
11	11/24/15	24.13	268.01	\$3,016	\$33,502	12/31/15	383.43	10,432.10	\$8,819	\$239,939
12	11/24/15	24.36	292.37	\$3,045	\$36,547	1/4/16	759.73	11,191.83	\$17,474	\$257,412
13	11/24/15	22.99	315.36	\$2,874	\$39,421	1/5/16	397.57	11,589.40	\$9,144	\$266,557
14	11/24/15	22.89	338.25	\$2,861	\$42,282	1/13/16	180.08	11,769.48	\$4,142	\$270,698
15	11/25/15	24.88	363.13	\$3,110	\$45,392	1/14/16	814.73	12,584.21	\$18,739	\$289,437
16	11/25/15	22.44	385.57	\$2,805	\$48,197	1/15/16	575.63	13,159.84	\$13,239	\$302,677
17	12/2/15	24.30	409.87	\$3,038	\$51,234	1/20/16	737.62	13,897.46	\$16,965	\$319,642
18	12/2/15	22.65	432.52	\$2,831	\$54,066	1/21/16	539.67	14,437.13	\$12,412	\$332,054
19	12/8/15	23.05	455.57	\$2,881	\$56,947	1/22/16	91.04	14,528.17	\$2,094	\$334,148
20	12/8/15	22.80	478.37	\$2,850	\$59,797	1/27/16	476.59	15,004.76	\$10,962	\$345,110
21	12/8/15	24.50	502.87	\$3,063	\$62,859	1/28/16	458.69	15,463.45	\$10,550	\$355,660
22	12/8/15	23.80	526.67	\$2,975	\$65,834	1/29/16	186.51	15,649.96	\$4,290	\$359,949
						2/1/16	417.34	16,067.30	\$9,599	\$369,548
						2/2/16	407.02	16,474.32	\$9,361	\$378,910
						2/3/16	230.77	16,705.09	\$5,308	\$384,217
						2/4/16	702.55	17,407.64	\$16,159	\$400,376
						2/10/16	106.41	17,514.05	\$2,447	\$402,823






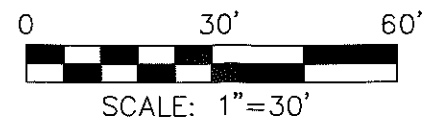
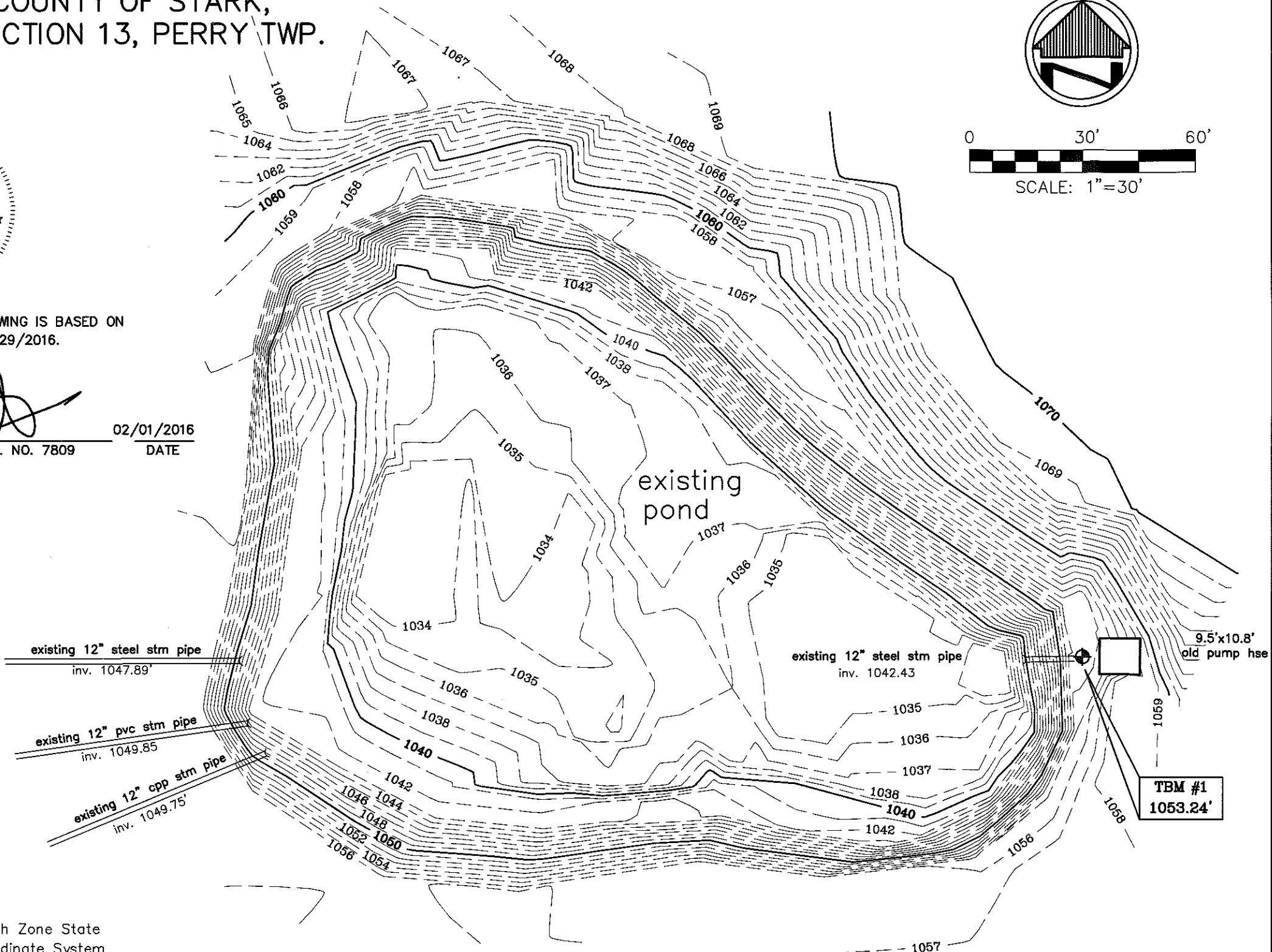
**ATTACHMENT 3**  
**POND NO. 2 SURVEYS**

STATE OF OHIO, COUNTY OF STARK,  
N.E. QUARTER SECTION 13, PERRY TWP.



I HEREBY CERTIFY THAT THIS DRAWING IS BASED ON  
ACTUAL FIELD CONDITIONS ON 01/29/2016.

  
JAMES P. YURKSCHATT  
CAMPBELL & ASSOCIATES, INC.  
REG. NO. 7809  
DATE 02/01/2016



DATE: 01/29/16  
BY: BAD  
SCALE: 1"= 30'

PHASE No. 2 POND AS-BUILT  
CANTON DROP FORGE  
4575 SOUTHWAY STREET S.W.  
CANTON, OHIO



CAMPBELL &  
ASSOCIATES, INC.  
Land Surveying  
3485 Fortuna Drive Suite 100  
Akron, Ohio 44312  
(330) 945-4117  
www.campbellsurvey.com

JOB NO.  
20150014\_2016

SHEET 1 OF 1

Horizontal Datum: Ohio North Zone State  
Plane Coordinate System


Vertical Datum: NAVD 88

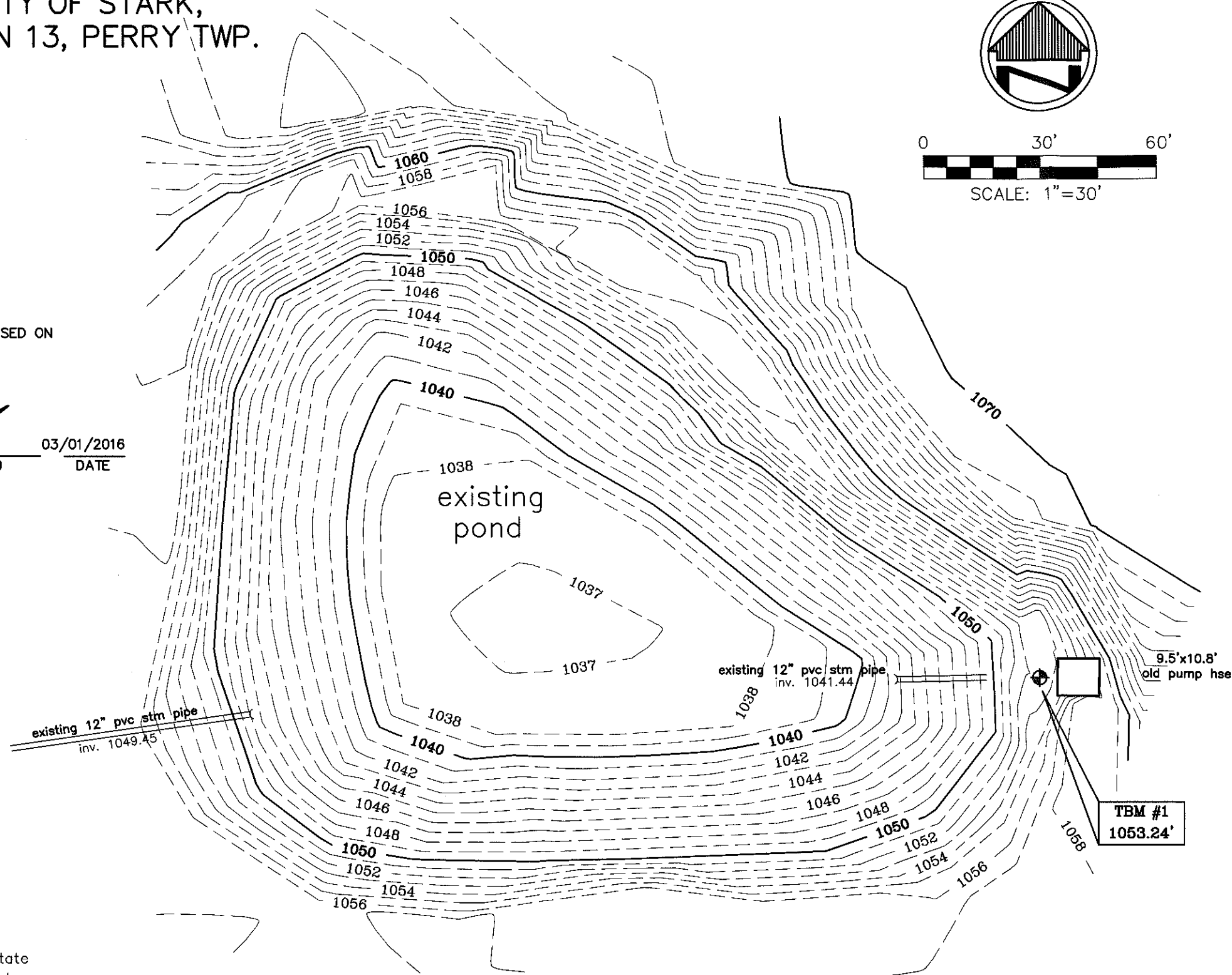
⊕ = TBM 5/8" rebar set

STATE OF OHIO, COUNTY OF STARK,  
N.E. QUARTER SECTION 13, PERRY TWP.



I HEREBY CERTIFY THAT THIS DRAWING IS BASED ON  
ACTUAL FIELD CONDITIONS ON 03/01/2016.

  
JAMES P. YURKSCHATT REG. NO. 7809  
CAMPBELL & ASSOCIATES, INC. DATE 03/01/2016



Horizontal Datum: Ohio North Zone State  
Plane Coordinate System

Vertical Datum: NAVD 88

⊕ = TBM 5/8" rebar set

DATE: 03/01/16

BY: BAD

SCALE: 1" = 30'

PHASE No. 2 POND AS-BUILT

CANTON DROP FORGE  
4575 SOUTHWAY STREET S.W.  
CANTON, OHIO



CAMPBELL &  
ASSOCIATES, INC.

Land Surveying

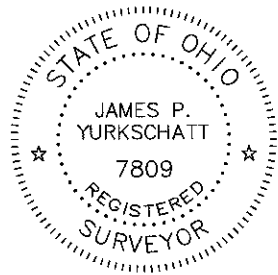
3485 Fortuna Drive Suite 100  
Akron, Ohio 44312  
(330) 945-4117  
www.campbellsurvey.com

JOB NO.


20150014\_2016

SHEET 1 OF 1

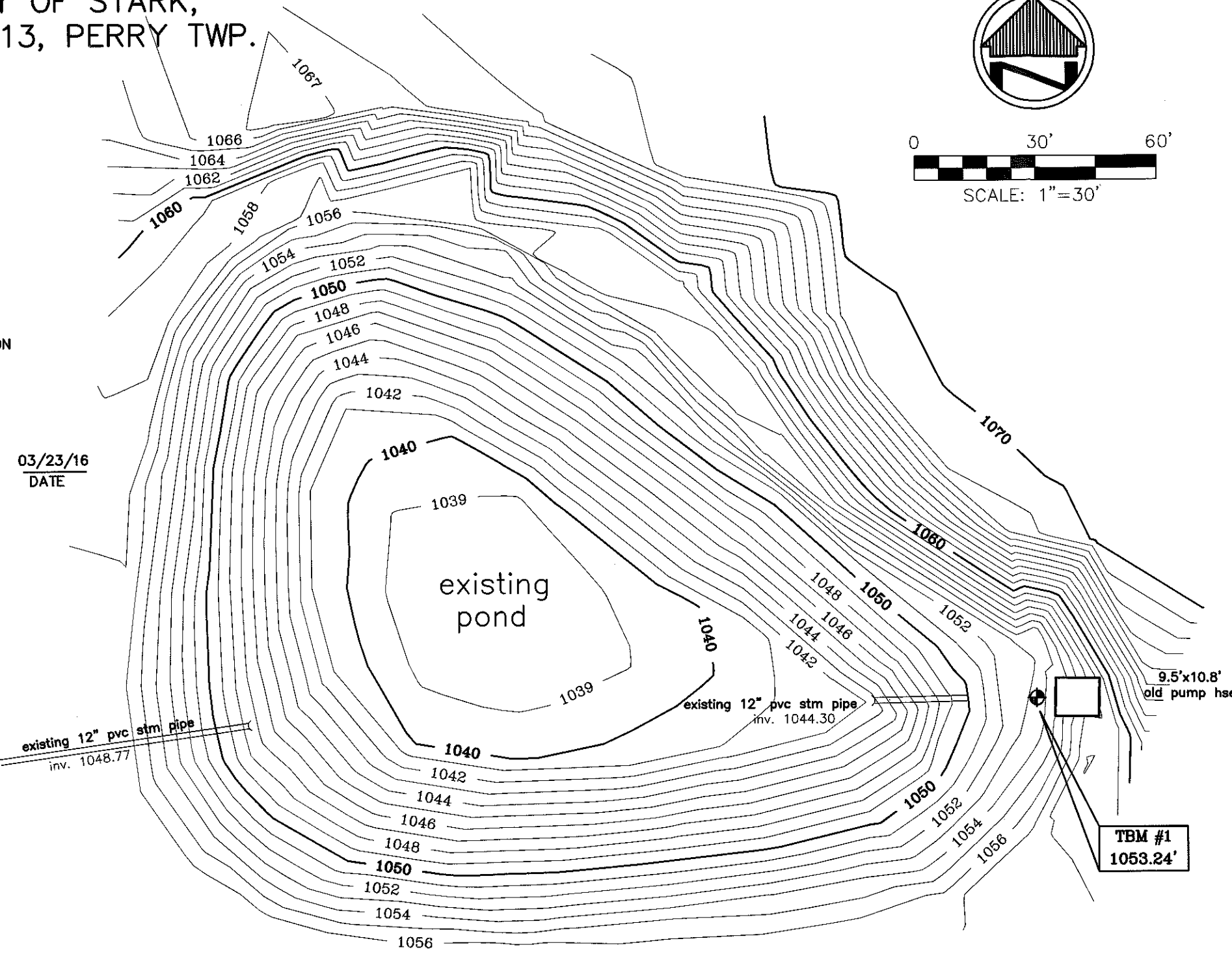
STATE OF OHIO, COUNTY OF STARK,  
N.E. QUARTER SECTION 13, PERRY TWP.



I HEREBY CERTIFY THAT THIS DRAWING IS BASED ON  
ACTUAL FIELD CONDITIONS ON 03/18/2015.

  
JAMES P. YURKSCHATT REG. NO. 7809  
CAMPBELL & ASSOCIATES, INC.

03/23/16  
DATE



Horizontal Datum: Ohio North Zone State  
Plane Coordinate System

Vertical Datum: NAVD 88

⊕ = TBM 5/8" rebar set

DATE: 03/23/16  
BY: BAD  
SCALE: 1"=30'

PHASE No. 2 POND AS-BUILT  
CANTON DROP FORGE  
4575 SOUTHWAY STREET S.W.  
CANTON, OHIO



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(330) 945-4117  
www.campbellsurvey.com

JOB NO.  
20150014\_2016





**ATTACHMENT 4**

**POND NO. 2 BACKFILL/RESTORATION  
MATERIAL SOURCES**



# TIGER

411 Oberlin Avenue SW,  
Massillon, OH 44647  
Phone: (330) 833-6325  
Fax: (330) 830-1021  
Website: [www.tigersandgravel.com](http://www.tigersandgravel.com)

March 29, 2016

Mr. John Ehrnfelt  
Environmental Management Specialists, Inc.  
4601 Homer Ohio Lane  
Groveport, OH 43125

RE: ODOT #603 Gravel

Dear Mr. Ehrnfelt:

This letter is with regard to the material you have requested for your project at Canton Drop Forge. Our ODOT #603 Gravel is processed at 411 Oberlin Avenue SW in Massillon, Ohio. The material is washed and a virgin material. When processing ODOT #603 Gravel, it is dug 5' to 40' below grade. To date, we have never had any contamination problems with our ODOT #603 Gravel and we have no reason to believe there are any environmental issues.

If you should need any further information, please do not hesitate to contact me direct on my cell at 330-323-2424.

Sincerely,

  
Jonathan Stock  
Plant Manager

Dak/JDS



Kimble Company  
3596 State Route 39 NW  
Dover, OH 44622  
Phone: (330) 343-1226  
Fax: (330) 343-7560  
[www.kimblecompanies.com](http://www.kimblecompanies.com)

---

April 1, 2016

RE: EMS on Site/Canton Drop Forge

To Whom It May Concern:

The clay material that was recently hauled from our East Sparta pit to the project at Canton Drop Forge has been recently produced and processed. This material is free from hazardous, toxic and radioactive wastes.

If you need anything further please feel free to contact Dave Jones at (330) 340-9043 or myself at the contact information listed below.

Sincerely,

A handwritten signature in blue ink, appearing to read "MSnyder", is written over the word "Sincerely,".

Mick Snyder  
Kimble Company  
3596 State Route 39 NW  
Dover, OH 44622  
(330) 343-1226 x2379  
[msnyder@kimblecompanies.com](mailto:msnyder@kimblecompanies.com)



# King's Dump Truck & Topsoil

---

4586 Fohl St. S.W. Canton, Ohio 44706

330-484-3825

March 22, 2016

Environmental Management Specialist, Inc  
4601 Homer Ohio Lane  
Groveport, Ohio 43125

Dear Mr. Ehrnfelt:

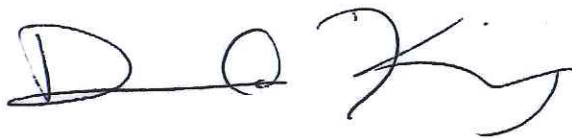
Our virgin topsoil is located in Navarre, Ohio by the YMCA and Neomodal on Market St.

I have no reason to believe that there are any environmental issues with this material.

Please let me know if you have any questions.

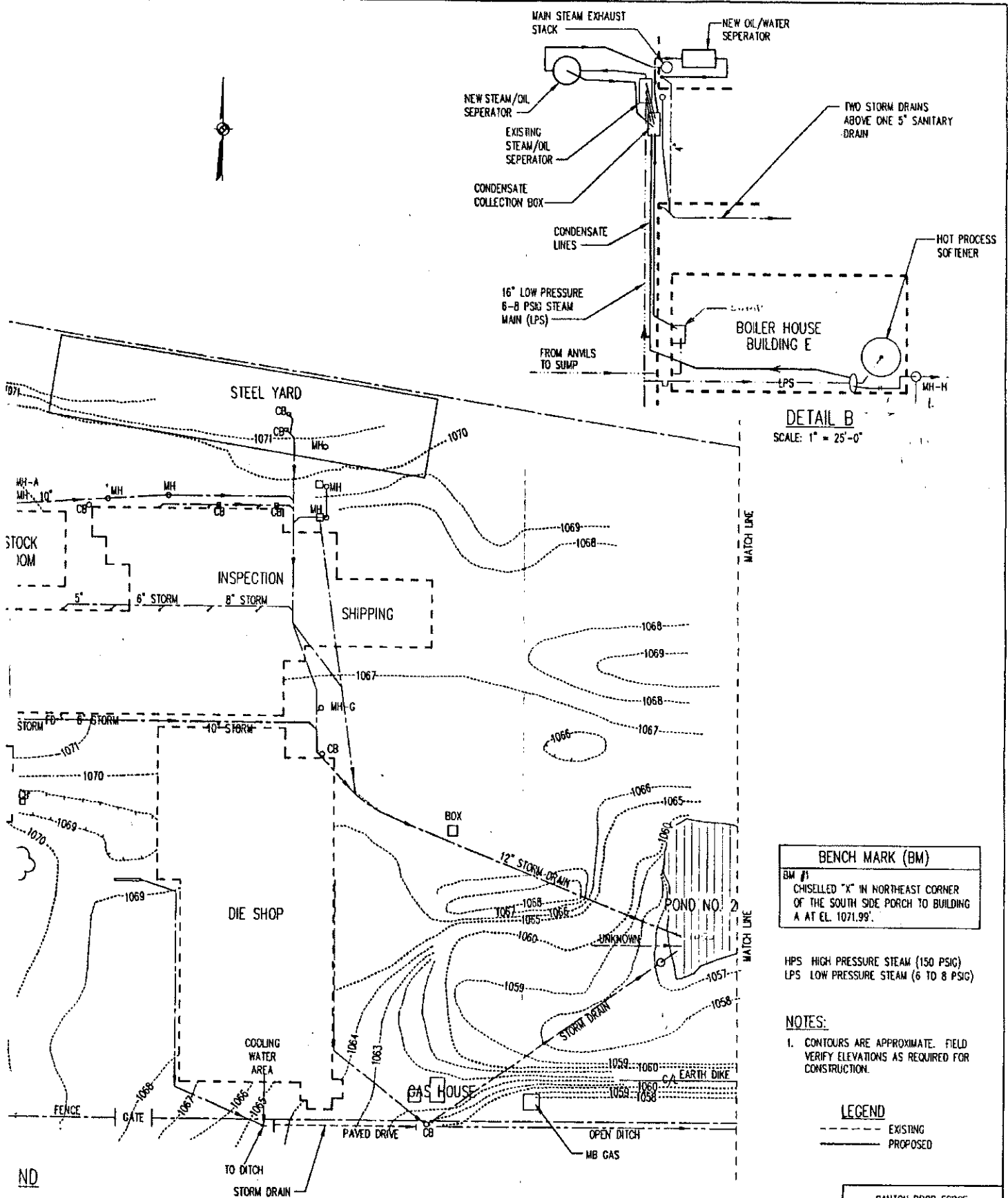
Thank You

David King  
Owner  
King's Dump Truck & Topsoil

A handwritten signature in black ink, appearing to read 'D. King', with a stylized flourish at the end.

King's Landscape & Bobcat Work  
4586 Fohl St. Sw  
Canton, Ohio 44706  
330-312-6988





to be...  
2 - EIPA...



1382 West Ninth Street  
Suite 400  
Cleveland, OH 44113

216.344.3072 PHONE  
216.344.3073 FAX

[www.trcsolutions.com](http://www.trcsolutions.com)

July 12, 2016

RCRA Branch (LR-8J)  
U.S. EPA, Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604

Attention: Mr. Brian Kennedy

Reference: Quarterly Progress Report  
Consent Agreement and Final Order (CAFO)  
Docket No. RCRA-05-2014-0013  
Project No. 242933.0000

Dear Mr. Kennedy:

TRC Environmental Corporation (TRC), is pleased to submit, on behalf of Canton Drop Forge (CDF), the attached Progress Report for the **Second Quarter 2016**, as agreed to in the Consent Agreement and Final Order (CAFO) journalized by the United States Environmental Protection Agency (U.S. EPA) on September 18, 2014.

Should you have any questions regarding the enclosed document, please contact me at (216) 344-3072 or via e-mail [kteuscher@trcsolutions.com](mailto:kteuscher@trcsolutions.com).

Sincerely,

**TRC Environmental Corporation**

Kathleen R. Teuscher  
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**PROGRESS REPORT – Second Quarter 2016**  
**Canton Drop Forge, Inc.**  
**Canton, Ohio**  
**U.S. EPA ID No. OHD00446S142**

**A. IDENTIFICATION OF FACILITY AND ACTIVITY**

TRC Environmental Corporation (TRC), at the request of Canton Drop Forge Inc. (CDF), has prepared this quarterly Progress Report (Second Quarter 2016) as required by the Consent Agreement and Final Order (CAFO; effective date September 18, 2014) between U.S. EPA Region 5 and CDF for CDF's facility at 4575 Southway Street SW, Canton, Ohio. As required by Paragraph 47 of the CAFO, this Progress Report discusses the work performed during the previous quarter, the data collected, and any problems encountered. This Report also includes a progress update on tasks specified on the project schedule.

**B. STATUS OF WORK AT THE FACILITY AND PROGRESS DURING THE QUARTER**

The CDF Ponds Closure Plan (Closure Plan), dated September 8, 2014, was approved by Ohio EPA on October 29, 2014. Pond No. 1 remediation was initiated during the fourth quarter of 2014 and completed during the first quarter of 2015. Remediation activities at Pond No. 1 included the removal of oil-water emulsion and impacted sediment and surrounding soils, and restoration of the pond including placement of an impermeable clay liner. These remediation and restoration activities were previously described and documented in previous Progress Reports submitted as required by the CAFO. Pond No. 2 remediation was initiated during the fourth quarter of 2015 and completed during the second quarter of 2016, thereby completing the tasks per the Closure Plan. Consequently, the final Closure Certification Report (CCR) dated June 24, 2016 was submitted to U.S. EPA Region 5 in accordance with the CAFO.

Implementation of the Closure Plan and specific tasks as they are related to the completion of remediation of Pond No. 2 during second quarter 2016 are listed below.

**(i) The status of the removal of oil-water emulsion from Pond No. 2.**

Dewatering of Pond No. 2 was completed during previous quarter (4<sup>th</sup> Quarter 2015).

**(ii) The status of the excavation of oil-impacted bottom material from Pond No. 2.**

Excavation of oil-impacted bottom material from Pond No. 2 was initiated during the fourth quarter of 2015, and was completed in the first quarter of 2016. Final excavation activities of oil-impacted bottom material from Pond No. 2 were completed the first quarter of 2016. Documentation (e.g., manifests) of waste disposal of the solid materials removed from the Pond No. 2 excavation (supplied by the disposal facility) is included in the final CCR.

**(iii) The status of the excavation of oil-affected soils adjacent to Pond No. 2.**

On May 4, 2016, removal of the partially buried brick structure adjacent to the pump house and remaining debris was performed. The brick structure appeared to be approximately 10 ft. x 5 ft. and filled with soil. By visual observation the soil did not appear to be impacted with petroleum. As soil and debris were removed from the structure, what appeared to be an old pump was uncovered. No saturated or impacted soils were observed around the "old pump." Mr. Shadrach of Ohio EPA was requested to visit the site to observe the removal of the additional material. Debris and impacted material surrounding the buried brick structure were removed as much as reasonably

possible. However, part of the brick structure remains in place. The petroleum impacted wood (possible roofing material) and bricks were removed to a depth until no further petroleum impacts were visible. This was three to four feet of soil and debris, including two adjacent crushed drums that were unearthed during the removal process.

**(iv) The status of confirmatory sampling (as applicable).**

Confirmatory sampling was performed during the first quarter of 2016 following removal activities for the purpose of evaluating site conditions under the Ohio VAP following closure of the ponds. Confirmation samples included collection of random grid samples as well as judgmental samples biased towards areas of potential impact based on visual observations (e.g., staining, seams, pipe inlets or structures identified during removal activities). These results will be included in future VAP submittals for the property. Figures presenting the approximate confirmation sampling locations for Pond 1 and Pond 2 are included in the CCR.

**(v) The status of backfilling and restoration of Pond No. 2.**

Backfilling and restoration of Pond No. 2 was initiated following adequate removal of all residuals within Pond No. 2 and following the confirmatory sampling activities noted in (iv) above. At the close of the first quarter 2016, placement of the clay liner and final topsoil was complete.

**C. PROBLEMS ENCOUNTERED DURING THE QUARTER**

As noted above, partially buried brick structure adjacent to the pump house and remaining debris was identified requiring additional investigation and removal.

**D. ACTIONS TAKEN TO RECTIFY PROBLEMS**

On May 4, 2016, Mr. Shadrach of Ohio EPA was requested to visit the site to observe the removal of the additional material. The petroleum impacted wood and bricks were removed to a depth until no further petroleum impacts were visible. The debris was staged and removed off-site on May 19, 2016 by Kimble Recycling and Disposal, Inc. Upon final removal of all impacted soil and debris, removal and restoration activities are considered complete. A figure of the Pond 2 following removal activities is provided in the CCR and includes former features such as the pump house and approximate location of the partially buried brick structure, and pipes identified during removal activities.

**E. PROJECT SCHEDULE**

Remediation of Pond No. 2 was completed during May 2016 and the CCR was submitted in June 2016. The project schedule and progress report are presented below by task:

Item	Task	Description of Status
1	Consent Agreement and Final Order U.S. EPA Docket No. RCRA-05-2014-0013	Effective date September 14, 2014.
2	Closure Plan Submittal	Received by Ohio EPA on September 9, 2014. Approved October 29, 2014.
3	Agency Review and 30-Day Public Notice Period	Submitted for public comment period ending October 17, 2014. Closure Plan approved October 29, 2014.

Item	Task	Description of Status
4	Quarterly Progress Reports	Initiated 3rd quarter 2014.
5	Installation/Implementation of Upgraded Oil Water Separator (OWS) System	Construction complete and the system is operational.
6	Contractor Procurement / Mobilization (including 10-Day Notification to Ohio EPA prior to mobilization)	<p>Kick-off meeting held at CDF on November 19, 2014. Attendees included CDF, Ohio EPA, and TRC Environmental. The meeting served as the 10-day notification to Ohio EPA.</p> <p>Environmental Management Specialists, Inc. (EMS) was procured through CDF as the contractor to perform the excavation. TRC is performing oversight.</p>
7	Pond No. 1 Remediation: <ul style="list-style-type: none"> <li>– Dewatering, Excavation, Disposal</li> <li>– Visual Inspection (CDF/Ohio EPA) and Verification of Completion</li> </ul>	<p>Pond No. 1 remediation was initiated following the above 10-day notification. Dewatering, excavation, and disposal were near completion as of the close of the fourth quarter 2014, with removal of the bottom clay liner overlapping into the first quarter of 2015.</p> <p>Visual inspection by Ohio EPA to verify completion was performed January 20, 2015.</p>
8	Pond No. 1 Backfill, Installation of Clay Liner	Pond No. 1 was backfilled late January 2015 and installation of the clay liner immediately followed.
9	Pond No. 2 Remediation: <ul style="list-style-type: none"> <li>– Dewatering, Excavation, Disposal</li> <li>– Visual Inspection (CDF/Ohio EPA)</li> </ul>	<p>Initial dewatering began in September 2015 with Pond No. 2 water being treated and recycled for reuse within the CDF facility. Construction for the sewer connection is complete. Dewatering was completed in the mid-October 2015. Subsequent material removal of Pond No. 2 was initiated in the November 2015 and completed in the early Spring 2016.</p> <p>Visual inspection of remediation progress was performed by Ohio EPA on January 19, 2016, February 5, 2016, and February 9, 2016 to verify completion of removal activities.</p>
10	Pond No. 2 Backfill, Installation of Clay Liner	Pond No. 2 was backfilled March 2016 and installation of the clay liner and restoration immediately followed. Visual inspection and approval of restoration was performed by Ohio EPA on May 4, 2016.
11	Closure Certification Document	June 2016